

EXHIBIT J

Declaration of Tracy Greenamyre

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JUAN FLORES-MENDEZ, an individual and
TRACY GREENAMYER, an individual, and
on behalf of classes of similarly situated
individuals,

Plaintiffs,

v.

ZOOSK, INC., a Delaware corporation,

Defendant.

CASE NO: 3:20-cv-04929-WHA

Assigned to Hon. William Alsup

**DECLARATION OF PLAINTIFF TRACY
GREENAMYER IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Complaint filed July 22, 2020
First Amend. Comp. filed October 30, 2020
Second Amend. Complaint filed July 28, 2021

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DECLARATION OF TRACY GREENAMYER

Pursuant to 28 U.S.C. § 1746, I, Tracy Greenamyer, hereby declare as follows:

1. My name is Tracy Greenamyer, and I am over eighteen years of age and am competent to testify to and have personal knowledge of the facts set forth herein.

2. I am a plaintiff in a lawsuit against Zoosk, Inc. I understand that the case has been brought as a class action on behalf of a nationwide class of individuals whose personally identifiable information (“PII”) was compromised in the Data Breach announced by Zoosk on June 3, 2020 (the “Nationwide Class”), as well as subclasses consisting of all individuals whose PII was compromised in the Data Breach announced by Zoosk on June 3, 2020, who paid for subscriptions with Zoosk (the “Subscription Subclass”), and all individuals whose PII was compromised in the Data Breach announced by Zoosk on June 3, 2020, who reside in California (in the alternative, should either of the two above classes be limited to California residents only) (the “California Subclass”). As a class representative, I understand I have a duty to protect the interests of the class. I will protect the best interests of the members of the class and will work with my attorneys to try and obtain a successful result. I know of no facts that would limit my ability to adequately represent the interests of other members of the class, or that my interests conflict in any way with the interests of the class.

3. It is my understanding that I am member of the Nationwide Class as well as the Subscription and California Subclasses, in that I reside in California, I was a paid Zoosk subscriber, and my information was compromised in the Data Breach.

4. I am willing to do whatever is necessary to protect the interests of the members of the class. I have retained lawyers who have experience in class action litigation. I have discussed this case with my lawyers on numerous occasions. I will provided deposition testimony in this case on May 25, 2022, and have responded to written discovery, and I am committed to appearing at the trial of the case. I am aware that there are expenses involved in representing a class and have arranged with my attorneys that the expenses will be paid by my attorneys and that they will seek reimbursement of these expenses if a recovery is obtained.

1 5. I am familiar with the claims that have been asserted in the case and will stay up to
2 date on developments in this case by conferring with my attorneys on a regular basis.

3 I declare under penalty of perjury of the laws of the United States of America and the State
4 of California that the foregoing is true and correct.

5 Executed on May 20, 2022 at San Diego, California

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